

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

January 12, 2012

OFFICE OF  
SOLID WASTE AND  
EMERGENCY RESPONSE

VIA E-MAIL

Mr. Alan Wood  
American Electric Power  
1 Riverside Plaza,  
Columbus, Ohio 43215-2373

Re: Request for Action Plan regarding OK Public Service Co – Oklaunion Power Station

Dear Mr. Wood,

On February 23, 2011 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the OK Public Service Co – Oklaunion Power Station facility. The purpose of this visit was to assess the structural stability of the impoundments or other similar management units that contain "wet" handled CCRs. We thank you and your staff for your cooperation during the site visit. Subsequent to the site visit, EPA sent you a copy of the draft report evaluating the structural stability of the units at the OK Public Service Co – Oklaunion Power Station facility and requested that you submit comments on the factual accuracy of the draft report to EPA. Your comments were considered in the preparation of the final report.

The final report for the OK Public Service Co – Oklaunion Power Station facility is enclosed. This report includes a specific condition rating for each CCR management unit and recommendations and actions that our engineering contractors believe should be undertaken to ensure the stability of the CCR impoundment(s) located at the OK Public Service Co – Oklaunion Power Station facility. These recommendations are listed in Enclosure 2.

Since these recommendations relate to actions which could affect the structural stability of the CCR management unit(s) and, therefore, protection of human health and the environment, EPA believes their implementation should receive the highest priority. Therefore, we request that you inform us on how you intend to address each of the recommendations found in the final report. Your response should include specific plans and schedules for implementing each of the recommendations. If you will not implement a recommendation, please provide a rationale. Please provide a response to this request by February 13, 2012. Please send your response to:

Mr. Stephen Hoffman  
U.S. Environmental Protection Agency (5304P)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

If you are using overnight or hand delivery mail, please use the following address:

Mr. Stephen Hoffman  
U.S. Environmental Protection Agency  
Two Potomac Yard  
2733 S. Crystal Drive  
5<sup>th</sup> Floor, N-5838  
Arlington, VA 22202-2733

You may also provide a response by e-mail to [hoffman.stephen@epa.gov](mailto:hoffman.stephen@epa.gov), [kohler.james@epa.gov](mailto:kohler.james@epa.gov), and [englander.jana@epa.gov](mailto:englander.jana@epa.gov).

You may assert a business confidentiality claim covering all or part of the information requested, in the manner described by 40 C. F. R. Part 2, Subpart B. Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when EPA receives it, the information may be made available to the public by EPA without further notice to you. If you wish EPA to treat any of your response as "confidential" you must so advise EPA when you submit your response.

EPA will be closely monitoring your progress in implementing the recommendations from these reports and could decide to take additional action if the circumstances warrant.

You should be aware that EPA will be posting the report for this facility on the Agency website shortly.

Given that the site visit related solely to structural stability of the management units, this report and its conclusions in no way relate to compliance with RCRA, CWA, or any other environmental law and are not intended to convey any position related to statutory or regulatory compliance.

Please be advised that providing false, fictitious, or fraudulent statements of representation may subject you to criminal penalties under 18 U.S.C. § 1001.

If you have any questions concerning this matter, please contact Mr. Hoffman in the Office of Resource Conservation and Recovery at (703) 308-8413. Thank you for your continued efforts to ensure protection of human health and the environment.

Sincerely,  
/Suzanne Rudzinski/, Director  
Office of Resource Conservation and Recovery

Enclosure

**OK Public Service Co – Oklaunion Power Station Recommendations (from the final assessment report)**

**1.0 CONCLUSIONS AND RECOMMENDATIONS****1.1 CONCLUSIONS**

Conclusions are based on visual observations from a one-day site visit, February 23, 2011, and review of technical documentation provided by American Electric Power.

**1.1.1 Conclusions Regarding the Structural Soundness of the Management Unit(s)**

The dike embankments appeared to be structurally sound based on Dewberry engineers' observations during the site visit. However, no geotechnical analyses were provided to Dewberry. Therefore, no determination can be made regarding Structural Soundness of the CCP Management Unit.

**1.1.2 Conclusions Regarding the Hydrologic/Hydraulic Safety of the Management Unit(s)**

No hydrologic or hydraulic analyses were provided to Dewberry. Therefore, no determination can be made regarding Hydrologic/Hydraulic Safety of the CCP Management Unit.

**1.1.3 Conclusions Regarding the Adequacy of Supporting Technical Documentation**

The supporting technical documentation was inadequate with the exception of original Plans and Specifications of the Management Unit. Engineering documentation provided and subsequently reviewed is included in Appendix A of the final report.

**1.1.4 Conclusions Regarding the Description of the Management Unit(s)**

The description of the management unit provided by the Owner was a fairly accurate representation of what Dewberry observed in the field. Pond 6 is the only non-incised CCR pond that has been in service in the recent past. All other ponds on site either are incised or do not receive CCR. Also Pond 6 is in the process of being filled and eventually will be closed.

**1.1.5 Conclusions Regarding the Field Observations**

Dewberry staff was provided access to all areas in the vicinity of the management unit required to conduct a thorough field observation. The visible parts of the embankment dikes observed had no signs of overstress, significant settlement, shear failure, or other signs of instability. Embankments appeared structurally sound. There were no apparent indications of unsafe conditions or conditions needing remedial action. However, the only non incised pond (Pond 6) that received CCR appeared to be in the process of being filled and closed.

**1.1.6 Conclusions Regarding the Adequacy of Maintenance and Methods of Operation**

The current maintenance and methods of operation appear to be adequate for the non-incised pond, Pond 6. There was no evidence of significant embankment repairs or prior releases observed during the field inspection. However, there is no maintenance procedure documented.

**1.1.7 Conclusions Regarding the Adequacy of the Surveillance and Monitoring Program**

The surveillance program appears to be adequate. The management unit dikes are not instrumented. Based on a history of a current and regular inspection program and the fact that the only non-incised CCR pond (Pond 6) is in the process of being closed, installation of a dike monitoring system is not needed at this time. However, if Pond 6 is kept in operation a Surveillance and Monitoring Program should be documented.

**1.1.8 Classification Regarding Suitability for Continued Safe and Reliable Operation**

The Pond 6, Wastewater Evaporation Pond, is rated POOR for continued safe and reliable operation until the receipt of the deficient documentation concerning H&H safety and structural stability of the embankments; or receipt of an approved closure plan and schedule.

**1.2 RECOMMENDATIONS****1.2.1 Recommendations Regarding the Structural Stability**

We recommend AEP conduct a geotechnical analysis of the impoundment structure or provide a closure plan and schedule for Pond 6.

**1.2.2 Recommendations Regarding the Hydrologic/Hydraulic Safety**

We recommend AEP conduct a Hydraulic and Hydrologic study that includes a discussion of the potential for pond flooding and release of CCR, if Pond 6 is not closed in the near future.

**1.2.3 Recommendations Regarding the Supporting Technical Documentation**

The following recommendation is warranted: if Pond 6 is to be closed the operator should provide a closure plan and schedule.

**1.2.4 Recommendations Regarding the Maintenance and Methods of Operation**

It is recommended that AEP develop and document a Maintenance and Methods of Operation Procedure, including checklists, or, as stated in Section 1.2.3, the plant should provide a closure plan and schedule for Pond 6.

**1.2.5 Recommendations Regarding Continued Safe and Reliable Operation**

The recommendations cited above, upon implementation, will ensure continued safe and reliable operation.